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District Counsel

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897  
Address: 869 N. Cherry Street  
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-1

Chapter 9

Date: November 16, 2017  
Time: 9:30 a.m.  
Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13  
Judge: Honorable René Lastreto II

**DECLARATION OF RILEY C. WALTER IN SUPPORT OF REPLY TO LIMITED  
OPPOSITION TO APPLICATION FOR ORDER IMPLEMENTING EFFECTIVE DATE  
ON ORDER GRANTING MOTION FOR AUTHORIZATION TO REJECT EXECUTORY  
CONTRACT**

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1 I, Riley C. Walter, hereby declare and represent as follows.

2 1. My name is Riley Walter and I am a shareholder in the law firm of Walter  
3 Wilhelm Law Group. I am representing Tulare Local Healthcare District in this Chapter  
4 9 case. This declaration is in support of the Reply to Limited Opposition to Application  
5 for Order Implementing Effective Date on Order Granting Motion for Authorization to  
6 Reject Executory Contract.

7 2. Shortly after filing the Chapter 9 petition I sent to Marc Levinson and  
8 Hagop Bedoyan, counsel for Healthcare Conglomerate Associates, LLC a request to  
9 receive information on a daily basis as to cash coming into the District and cash going  
10 out.

11 3. On October 13, 2017 I received a report from Hagop Bedoyan that merely  
12 showed that money was going into a bank account and money going out. I responded  
13 by indicating that this was not sufficient to inform the District as to what money was  
14 coming into the District as to source and what money was going out of the District and  
15 to whom.

16 4. On October 23, 2017 Mr. Bedoyan sent to me a report showing money  
17 coming in through October 19 and money going out through October 20. In his email  
18 Mr. Bedoyan acknowledged that HCCA had agreed to supply and the court had ordered  
19 HCCA to supply cash-in and cash-out reports. See Exhibit 1.

20 5. This was the last time the District received a report on the daily cash in  
21 and cash out. I communicated with Mr. Levinson and Mr. Bedoyan by email on October  
22 31, 2017 at 11:30 am asking when we would be receiving these reports and no  
23 response was received.

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1           6.     For over nearly three weeks HCCA has not provided the daily cash in and  
2 cash out information requested by the District as to the District's own monies.

3           I am over the age of 18 and if I were called at a witness in connection with this  
4 case I would and could testify as is set out herein.

5           I so declare and represent under penalty of perjury this <sup>74</sup>15 day of November, 2017  
6 at Fresno, California.

7   
Riley C. Walter